IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF VERMONT

MOHSEN MAHDAWI, *Petitioner*,

v.

DONALD J. TRUMP, et al. *Respondents*.

Case No. 2:25-cv-00389

UNOPPOSED MOTION FOR LEAVE TO REFILE DOC. 45 AND CERTAIN EXHIBITS WITH REDACTIONS

Pursuant to Local Rule 5.2, Petitioner hereby moves the Court for Leave to File with Redactions replacing Doc. 45, attached as **Exhibit 1**, Doc. 45-1, attached as **Exhibit 2**, and Doc. 45-3, attached as **Exhibit 3**, submitted as part of Petitioner's Reply to the Government's Opposition to Petitioner's Motion for Release Under *Mapp v. Reno*. These documents contain sensitive health information relating to Petitioner's physical and mental conditions and this request is made in light of the potential lifting of Rule 5.2(c) restrictions. The redactions are appropriate given Petitioner's vulnerable position and the numerous harassment campaigns that Petitioner has already faced.

Counsel has, pursuant to L.R. 7(a)(7), communicated with counsel for the government with regards to this motion. The government does not oppose the relief requested.

Dated: May 19, 2025

Barre, VT

/s/ Lia Ernst Monica H. Allard Hillary A. Rich

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forthcoming